



Office of the  
Conflict of Interest and  
Ethics Commissioner

Commissariat aux  
conflits d'intérêts et  
à l'éthique

# ANNUAL REPORT

*Conflict of Interest Act*

2022  
23

Honourable Konrad W.  
von Finckenstein, C.M., K.C.

Interim Conflict of Interest  
and Ethics Commissioner

**Conflict of Interest and Ethics Commissioner – Annual Report 2022-2023**, in respect of the  
*CONFLICT OF INTEREST ACT*

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Office of the  
Conflict of Interest and  
Ethics Commissioner

Commissariat aux  
conflits d'intérêts et  
à l'éthique

September 2023

The Honourable Raymonde Gagné, C.M., O.M., Senator  
Speaker of the Senate  
Senate of Canada  
2 Rideau Street, Room E64-A  
Ottawa, Ontario K1A 0A4

Dear Madam Speaker:

I am pleased to submit to you my report on the performance of the Commissioner's duties and functions under the *Conflict of Interest Act* in relation to public office holders, for the fiscal year ending March 31, 2023, for tabling in the Senate.

This fulfills my obligations under paragraph 90(1)(b) of the *Parliament of Canada Act*.

Sincerely,

Honourable Konrad W. von Finckenstein, C.M., K.C.

Interim Conflict of Interest and Ethics Commissioner



Office of the  
Conflict of Interest and  
Ethics Commissioner

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à l'éthique

September 2023

The Honourable Anthony Rota, P.C., M.P.  
Speaker of the House of Commons  
House of Commons  
West Block, Room 233-C  
Ottawa, Ontario K1A 0A6

Dear Mr. Speaker:

I am pleased to submit to you the report on the performance of the Commissioner's duties and functions under the *Conflict of Interest Act* in relation to public office holders for the fiscal year ending March 31, 2023, for tabling in the House of Commons. The report is deemed permanently referred to the House of Commons Standing Committee on Access to Information, Privacy and Ethics, under Standing Order 108(3)(h)(v).

This fulfills my obligations under paragraph 90(1)(b) of the *Parliament of Canada Act*.

Sincerely,

Honourable Konrad W. von Finckenstein, C.M., K.C.

Interim Conflict of Interest and Ethics Commissioner

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# COMMISSIONER'S MESSAGE

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I am pleased to report on the administration of the *Conflict of Interest Act* in 2022-2023.

The Office expanded its focus on education and training during the year. Helping public office holders understand the rules helps them avoid conflicts between public and private interests. It also continued to help them comply with the Act and give them confidential advice and direction.

Those prevention efforts were balanced by enforcement measures as needed. The Office reported on two investigations under the Act. One was about the conduct of Minister Mary Ng. The other was about the conduct of Parliamentary Secretary Greg Fergus. Contraventions of the Act were found in both cases. It also reported on

three referrals from the Public Sector Integrity Commissioner, none of which led to an investigation.

The Office carried out its mandate in 2022-2023 through these and other actions.

I only came to this role in September 2023, so everything reported here was accomplished under previous leadership. And of course, it rests on the efforts of the Office's employees.

I am honoured to serve Parliament and Canadians and look forward to helping the Office continue its work. The Act and the *Conflict of Interest Code for Members of the House of Commons* are important accountability tools that help prevent public office from being used for private gain and support transparency. I will bring my experience and judgment to bear in administering them.

A handwritten signature in black ink, appearing to read 'Konrad W. von Finckenstein'. The signature is fluid and cursive.

Hon. Konrad W. von Finckenstein, C.M., K.C.  
Interim Conflict of Interest and Ethics Commissioner

## OUR VISION

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Offer exemplary services in support of a culture of integrity in order to achieve a high degree of public confidence in the integrity of federal institutions and Parliament.

## OUR MISSION

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Our Office provides independent, rigorous and consistent direction and advice to Members of Parliament and federal public office holders, conducts investigations and, where necessary, makes use of appropriate sanctions in order to ensure full compliance with the *Conflict of Interest Act* and the *Conflict of Interest Code for Members of the House of Commons*.

# OUR STAKEHOLDERS

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Regulatees are key stakeholders of the Office. They are the people who are subject to the conflict of interest regimes it administers. Stakeholders also include Parliament, academics, ethics practitioners and others with an interest in the field, the media and the general public.

This report touches on all stakeholder groups but focuses on the people covered by the [Conflict of Interest Act](#).

## PUBLIC OFFICE HOLDERS

Individuals subject to the Act are referred to as public office holders. They must all meet its recusal requirement, its core set of conflict of interest rules and its post-employment rules that apply for life.

**All public office holders** (snapshot as of March 31, 2023)

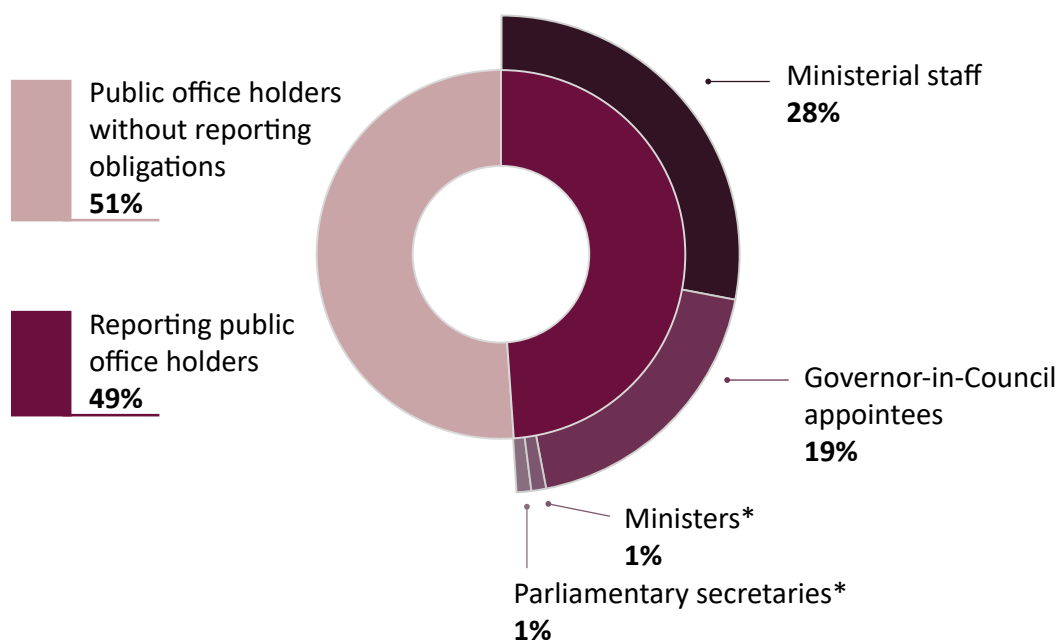


Just over half of them (51%) have to follow only those general rules. These “public office holders without reporting obligations” include part-time members of federal boards, commissions and tribunals appointed by the [Governor in Council](#) and ministerial staff who work on average less than 15 hours a week.

The rest (49%) have to follow some other rules as well. They must confidentially disclose certain information to the Office and publicly declare some information. They are restricted in their outside activities. They are not allowed to hold [controlled assets](#) like publicly traded securities. And they face a cooling-off period after leaving public office. These “reporting public office holders” include ministers and parliamentary secretaries, ministerial staff who work on average 15 hours or more a week and people appointed to full-time positions by the Governor in Council.



**Breakdown of reporting public office holders** (snapshot as of March 31, 2023)



\*Also subject to the *Conflict of Interest Code for Members of the House of Commons*

At the end of 2022-2023, 15% more people were subject to the Act than at the end of the year before. The Office’s [quarterly statistical reports](#) show how the number of public office holders varied during the year.

Turnover among public office holders affects the Office’s workload. For example, when a reporting public office holder is appointed or reappointed, the Office guides them through the initial compliance process. It advises them while they are in office and helps them understand the Act’s post-employment rules when they leave. It also posts their information in the public registry and maintains internal records for them.

**Turnover in 2022-2023**

	Appointed or reappointed	Left office
Reporting public office holders	331	258
Public office holders without reporting obligations	368	194

# OUR ACHIEVEMENTS

## *Key activities*

Reporting to Parliament	Reporting to Parliament and testifying before its committees
Compliance	Helping regulatees achieve and maintain compliance with the conflict of interest regimes
Direction and advice	Giving regulatees confidential guidance tailored to their individual situations
Education and outreach	Helping regulatees understand their obligations under the regimes
Enforcement	Applying investigation and other enforcement provisions of the regimes as appropriate
Public communications	Educating and informing regulatees, the media and the general public
Collaboration and best practices	Exchanging information with domestic and international counterparts

## REPORTING TO PARLIAMENT

The Conflict of Interest and Ethics Commissioner has a duty to report to Parliament, testify before parliamentary committees and answer questions from Parliament. The Commissioner reports on behalf of Canadians to Parliament directly, not through a minister. This reflects the Commissioner's [independence](#) as an Officer of the House of Commons.

By June 30 each year, the Commissioner must send an annual report on the administration of the *Conflict of Interest Act* to the Speakers of the House of Commons and Senate for tabling. The Office cannot submit the report in the absence of a Commissioner.

The Office sends communiqués to parliamentarians when it issues reports under the Act and the *Conflict of Interest Code for Members of the House of Commons*. It sent 10 communiqués in 2022-2023.

The House of Commons Standing Committee on Access to Information, Privacy and Ethics has oversight responsibility for the Office. It reviews the Office's annual spending estimates and matters related to the Commissioner's reports under the Act. On May 12, 2022, former Commissioner Mario Dion appeared before the Committee [to discuss](#) the Office's 2022-2023 budget. That appearance was part of the [Main Estimates](#) process.

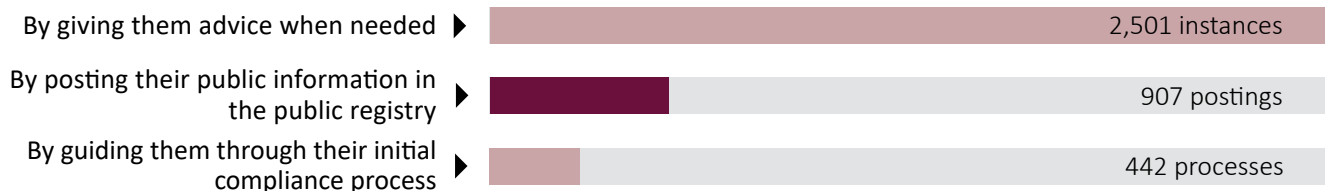
## COMPLIANCE

To support its mission to ensure full compliance with the conflict of interest regimes it administers, the Office uses most of its resources to help regulatees follow the rules.

Employees in the Advisory and Compliance division help public office holders comply with the *Conflict of Interest Act*. They give them confidential direction and advice. That guidance is sometimes based on legal opinions prepared by the Investigations and Legal Services division.

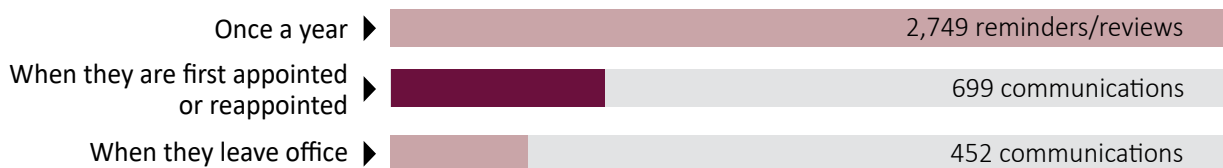
To meet the Act’s transparency requirements, the Office posts in the [public registry](#) some of the information submitted by public office holders.

### **How does the Office help public office holders comply with the Act?**



The Office aims to contact all public office holders personally within three days of learning of their appointment or reappointment.

### **When are public office holders contacted by the Office?**



## **INITIAL COMPLIANCE PROCESS**

All reporting public office holders must complete an [initial compliance process](#) under the *Conflict of Interest Act*. This means they have to give the Office certain information. When they disclose their information, advisors can help them arrange their affairs to avoid [conflicts of interest](#). Advisors also help them learn the rules. Once they complete the process, it is easier for them to comply with the Act going forward. Public office holders can also ask the Office for advice at any time.

Initial compliance is a two-stage process. It must be completed within 120 days after a reporting public office holder’s appointment, or after their reappointment if there is a gap since their last term of office. Reporting public office holders who do not complete these stages on time risk an [administrative monetary penalty](#).

The first stage must be completed within 60 days after appointment. This is when the reporting public office holder must submit a Confidential Report to the Office.

The second stage must be completed within 120 days after appointment. This is when an advisor in the Office reviews the Confidential Report and discusses it with the reporting public office holder. They also discuss any measures that may be needed to comply with the Act. Examples are [divestment](#) of controlled assets, withdrawal from [outside activities](#) and [conflict of interest screens](#). The advisor prepares a Summary Statement based on the Confidential Report and any needed public declarations for the reporting public office holder to review, sign and return. Once those items are signed and returned, the initial compliance process is over.

The Office then posts the reporting public office holder’s information in the [public registry](#).

## Helping new reporting public office holders comply with the Act



1

### INFORMING

The Office sends the regulatee an email or letter telling them about the rules and what they need to do.

### FILING

They must file a Confidential Report listing things like assets, debt and income within 60 days.

2



3

### EXPLAINING

An advisor reviews the Confidential Report and calls the regulatee to discuss their file.

### SIGNING

The advisor sends them an email or letter that identifies any extra steps needed and a summary of the Confidential Report for them to sign.

4



**442** Initial compliance processes completed.

5

### FINALIZING

The regulatee signs the summary and takes any extra steps required within 120 days of appointment.

*The process is completed when the information is added to the public registry.*

In 2022-2023, 83% of reporting public office holders submitted their initial compliance information on time. Of the remaining 17%, more than half submitted their information within one week of the deadline. Deadlines may be missed if the Office is not notified of new appointments right away or if complex measures are needed to complete the file.

The number of initial compliance processes completed does not always match the number of summary statements posted in the public registry in a given fiscal year. That is because some processes may have been completed in one fiscal year and the statements posted in the next.

## Divestment

Reporting public office holders must divest any [controlled assets](#) they have. They can sell them in an arm’s-length transaction (to someone other than a relative, friend or business associate). Or they can place them in a [blind trust](#).

Under [subsection 27\(10\)](#) of the Act, the Commissioner can grant an exception to this rule in certain cases. The reporting public office holder must not be a minister or parliamentary secretary. And their total investments in controlled assets must be of such minimal value they do not constitute any risk of conflict of interest in relation to their official duties and functions. For the Office to consider an exception, the value of the controlled assets must be less than \$30,000.

In 2022-2023, there were 50 divestments of controlled assets, including 38 by sale and 12 by blind trust.

The Office issues reimbursement orders to reporting public officer holders’ organizations for reasonable costs of setting up, maintaining and dismantling blind trusts. The Corporate Management division reviews and analyzes those costs, as well as withdrawal and commission fees. This helps the Commissioner decide if the costs are reasonable so reimbursement orders may be issued. In 2022-2023, 153 orders for reimbursement were issued, totalling just under \$775,000, down 27% from \$1 million the previous year. There were fewer reimbursement orders for setting up blind trusts than the year before.

In 2022-2023, the Office raised the maximum annual rates for reimbursing certain administrative costs for blind trusts. The new rates are listed in an updated [information notice](#). They apply to billing periods ending on or after January 1, 2023.

	2022-2023	2021-2022
Initial compliance processes completed	442	352
Divestments of controlled assets by sale	38	29
Divestments of controlled assets by blind trust	12	24

Public office holders without reporting obligations do not have to complete an initial compliance process. After they are appointed, the Office sends them a letter with a copy of the Act and a summary of the rules they need to follow. When the end of their term is coming up, the Office sends them a post-employment letter.

The Office also communicates with those public office holders while they are in office. In 2022-2023, for example, it sent them links to investigation reports and to the [2021-2022 Annual Report](#) under the Act and invited them to four educational sessions.

## ONGOING REPORTING REQUIREMENTS

After completing the initial compliance process, reporting public office holders must meet various reporting requirements throughout their time in office to stay in compliance with the *Conflict of Interest Act*.

For example, they must let the Office know about any change to the information in their Confidential Report, within 30 days of the change. This is very important because changes to their personal situation (called “material changes”) could create the potential for conflicts of interest. [Material changes](#) could include buying or selling a house or a car, getting or paying off a loan, and any new ties between their relatives or friends and government entities.

Disclosing this kind of information to the Office can help prevent conflicts of interest. It allows the Office to advise reporting public office holders of anything they must do. This could include submitting a new public declaration or amending an existing one.

### *Ongoing reporting requirements*



## Survey of Public Office Holders

The Office continued to use the results of its January 2022 survey of public office holders—the first such survey since the *Conflict of Interest Act* took effect in 2007—to improve service delivery.

To support transparency, in November 2022 it released detailed [survey results](#). Key takeaways:

- Most of those who responded believe the Office is a credible (80%), impartial (76%), helpful (73%), and trustworthy (81%) organization.
- The overwhelming majority (97%) said they were familiar with their obligations under the Act.
- Most (84%) who had recently interacted one-on-one with an Office employee were satisfied with their experience and thought the employee was courteous and helpful (91%), provided a timely and accurate response (89%) and gave them the information they needed (86%).
- Most said personal interactions are the Office’s top value-add.
- When asked about preferred training methods, most said they prefer online training with a live presenter.

The full survey is attached to this report as [Appendix B](#).

## END OF MANDATE AND POST-EMPLOYMENT

Some rules in the *Conflict of Interest Act* apply to public office holders who might be considering other jobs. Others apply to all public office holders after they leave public office.

While in office, public office holders must not let themselves be influenced by plans for, or offers of, outside employment. Reporting public office holders must let the Office know about all firm offers of outside employment within seven calendar days after receiving them. If a reporting public office holder is considering accepting an offer, their advisor can tell them if they can accept it given their obligations under the Act. If they accept an offer of outside employment, they must disclose the acceptance in writing to the Office, and to other authorities listed in the Act, within seven calendar days. Their advisor will then give them additional guidance on their current and post-employment obligations.

Some of the Act's [post-employment rules](#) apply to all former public office holders indefinitely. Others apply to former reporting public office holders for a cooling-off period of one or two years.

Former reporting public office holders do not have to report any new jobs they accept. However, they are encouraged to consult the Office to make sure they meet their post-employment obligations. The Office monitors sources of public information about their employment activities after leaving public office. It does this to ensure they meet the Act's post-employment rules and to check that those activities match the information they gave the Office when entering post-employment.

In 2022-2023, almost 250 individuals were still subject to a cooling-off period. This is a 40% decrease from the year before.

## PUBLIC REGISTRY

The Office maintains a [public registry](#) of all information about individual regulatees that the Commissioner is authorized to make public. It is a searchable database that is often accessed by regulatees, the media, members of the public, governments, and ethics practitioners around the world.

In 2022-2023, the Office posted almost 1,400 items for all regulatees in the public registry, up 10% from the year before.

There were over 80,500 public registry page views in 2022-2023, almost a third more than the year before. In the past few years, there has been an overall increase in the number of public registry visits, with significant spikes in the first and last quarters of 2022-2023. To promote transparency, the Office has drawn attention to the public registry in its public communications. This continued increase in the number of visits reflects greater interest in and knowledge of the Office's mandate and the regimes it administers.

## What did public office holders declare?

	2022-2023	2021-2022
Agreed compliance measures	25	25
Assets	104	139
Gifts or other advantages	167	41
Liabilities	22	82
Outside activities	154	120
Recusals	33	21
Summary statements	370	322
Travel*	9	13
Other	2	4

\*Ministers and parliamentary secretaries only

## DIRECTION AND ADVICE

Prevention is a major focus of the *Conflict of Interest Act*. Public office holders must learn the rules so they can recognize possible conflicts of interest and take steps to avoid them.

The Office guides public office holders proactively, giving them direction on issues that involve real or potential conflicts of interest.

It also encourages them to consult the Office if they have questions or concerns. Advisors give them advice based on the facts at hand, with input from the Commissioner as needed. The Commissioner personally reviews all advice for certain reporting public office holders. These include ministers, parliamentary secretaries, some heads of agencies, deputy ministers and chiefs of staff to ministers.

When asked, the Office also offers advice about the Act's requirements to people who are considering a public office holder position.

In 2022-2023, the Office responded to over 2,500 requests for advice from public office holders, down 25% from the year before. Several factors may account for this drop. For example, there were fewer requests for advice about post-employment obligations as there was an election the previous year that resulted in more turnover. The Office also targeted its educational sessions to public office holders to give them timely information about the Act. It received 18% fewer requests for advice about general obligations, likely because questions about them were answered during those sessions.

Requests for advice about gifts and other advantages more than tripled from the year before. There were 167 public declarations of gifts, including event invitations, four times more than in the year before. This may be in part because there were more in-person events than earlier in the pandemic.



The Office makes sure the confidential advice it gives public office holders is clear and consistent. Advice reflects their personal circumstances, so different advice may be given in cases that appear similar. The Office ensures consistency by recording the Commissioner’s interpretations of the Act in an internal practice manual that advisors can consult, and by adding public office holders’ requests for advice to their files.

The Office tracks the types of advice requested so it can spot trends that may impact its workload and identify training needs. It has noted that some activities prompt regulatees to ask for advice or disclose certain information. For example, in November 2022, the Office organized an educational session on reporting obligations. In the next quarter, the number of gifts or other advantages and recusals reported to the Office rose 22%.

The Office’s [quarterly statistical reports](#) track changes in the volume of requests for advice and types of advice requested. By monitoring and analyzing trends, the Office can anticipate and meet regulatees’ information needs.

***What did public office holders ask about by quarter?***

	Q1	Q2	Q3	Q4	2022-2023
Gifts and other advantages	107	81	104	117	<b>409</b>
Outside activities	82	70	63	93	<b>308</b>
Post-employment obligations	103	92	85	85	<b>365</b>
Material changes	172	169	174	240	<b>755</b>
General obligations	151	128	166	219	<b>664</b>

**EDUCATION AND OUTREACH**

Public office holders are key stakeholders of the Office. One of its strategic objectives is to increase the trust key stakeholders have in the Office and the Office’s credibility in their eyes. The idea is for them to become stronger allies in the delivery of its mandate and to be able to effectively manage conflict of interest issues.

In 2022-2023, the Office started implementing a strategic communications and engagement plan to help achieve that objective. The plan includes ways to better understand the needs of the Office’s audiences so it can make its communications and outreach activities more effective. Regulatees, including public office holders, are its primary target audience so the Office reaches them in different ways than the media, academics, domestic and international stakeholders, and others. Actions in the plan help the Office give public office holders the information they need, when they need it, and in the way they want to receive it.

In the past three years, the Office revamped its training materials, tested different technologies, and researched new ways to deliver educational sessions to regulatees. It also analyzed the results of the 2022 survey of public office holders to see if their roles affected their training needs and preferences. The result of all this research and testing was a plan for delivering educational sessions on a regular basis and in a purposeful way. In 2022-2023, the Office started regularly inviting public office holders to educational sessions geared to their particular status and where they are in their mandate.

Topic	Audience
Obligations	Reporting public office holders appointed in the last 60 days
Obligations	Public office holders without reporting obligations appointed in the last 120 days
Reporting requirements	Reporting public office holders whose annual reviews were coming up
Post-employment	Reporting public office holders working for tribunals, broads and commissions

The Office collected feedback on these sessions to continuously improve its education and outreach program. It engaged with the Privy Council Office so more public office holders could attend its educational sessions. This cooperation means potential Governor in Council appointees can be included in the sessions for new reporting public office holders. It also encourages attendance by helping make new regulatees aware of the sessions.

The Office gave 23 educational presentations to ministers' offices and organizations with public office holders. It offered 14 of these proactively and the rest when asked by regulatees or their organizations. The ministers' offices were Canadian Heritage, and International Trade, Export Promotion, Small Business and Economic Development.

Most of these educational activities were online, allowing more regulatees to attend, and letting participants ask questions anonymously. Online training is also cost-effective.

The Office reached over 300 regulatees through educational sessions and presentations in 2022-2023, fewer than the year before. This is because it invited fewer public office holders. It reached out to individual public office holders at specific points during their mandate so the sessions would be more useful to them.

The Office wrote an [op-ed](#) that was published in *The Hill Times* in August 2022. The article explained why ministerial staff must follow different conflict of interest rules than Members of the House of Commons' staff and what those rules are. *The Hill Times* is a key news source for ministerial staff and others who work on Parliament Hill, so this was a good opportunity for the Office to reach some of its key stakeholders.

The Office also conducts activities that may help educate future public office holders or ethics practitioners. For example, in January 2023 the Director of Communications, Outreach and Planning gave a presentation to a class at Carleton University. Lobbying Commissioner, Nancy Bélanger, also participated. The Office has a [Memorandum of Understanding](#) with the Commissioner of Lobbying for joint educational activities.

## ENFORCEMENT

The Office seeks to ensure full compliance with the *Conflict of Interest Act*. However, it can also use the Act's enforcement mechanisms to address non-compliance.

### Administrative Monetary Penalties

Under sections [52](#) and [53](#) of the Act, the Commissioner can impose [administrative monetary penalties](#) of up to \$500 for not meeting certain reporting requirements within set deadlines.

When a penalty is issued, the Commissioner must make public the nature of the violation, the name of the public office holder and the amount of the penalty. The Office posts penalties in the [public registry](#). It may also publish them on social media to support openness and transparency and encourage compliance.

#### *Administrative monetary penalties*



### Compliance Orders

Under section 30 of the Act, the Commissioner may order a public office holder to take any measure to comply with it. Compliance measures include submitting documents for their annual review, divesting [controlled assets](#) or ceasing prohibited activities. Like administrative monetary penalties, compliance orders are posted in the public registry and may be shared on social media.

#### *Compliance orders*



### Examinations

Investigations under the Act are called “examinations.” Under [section 44](#) of the Act, the Commissioner can investigate a possible contravention at the request of a Senator or Member of the House of Commons who provides reasonable grounds to believe the Act has been contravened. The Office received two examination requests from Members in 2022-2023.

Under [section 45](#) of the Act, the Commissioner may self-initiate an examination if the Commissioner has reason to believe a current or former public office holder has contravened the Act. A decision to investigate may result from information from media reports or complaints from members of the public, among other sources. The Office received eight examination requests from members of the public in 2022-2023.

The Commissioner issues a [public report](#) when an examination is completed. When the Commissioner decides to discontinue an examination launched under [section 44](#) of the Act, a discontinuance report is issued. However, when an examination launched under [section 45](#) is discontinued, the Commissioner decides whether to issue a report.

The Commissioner reports on examinations under the Act to the Prime Minister.

In 2022-2023, the Office issued two examination reports under the Act.

## ***Fergus Report***

The [Fergus Report](#), issued on February 14, 2023, focused the conduct of the Honourable Greg Fergus, Parliamentary Secretary to the Prime Minister and to the President of the Treasury Board, and Member of Parliament for Hull–Aylmer. Former Commissioner Dion found Mr. Fergus contravened section 9 the Act when he wrote a letter supporting a television network’s application for a broadcasting licence that was before the Canadian Radio-television and Telecommunications Commission (CRTC). Section 9 prohibits public office holders from using their position to seek to influence a decision of another person so as to improperly further another person’s private interests.

The Commissioner found the letter of support was intended to influence a CRTC decision in order to further the network’s private interests. The Commissioner further determined that Mr. Fergus sought to improperly further those private interests because he did not follow the practice established for parliamentary secretaries in dealing with administrative tribunals like the CRTC.

Even though Mr. Fergus signed the letter as a Member of Parliament and did not use his Parliamentary Secretary title, the Office had previously established, in compliance orders, in [The Gill Report](#) and in an [information notice](#), that ministers and parliamentary secretaries should not write letters of support to quasi-judicial tribunals like the CRTC, given their governmental roles and the influence they have. The role of parliamentary secretaries and the principle of non-intervention in quasi-judicial decisions are also outlined in the Prime Minister’s [Open and Accountable Government](#) guide.

## ***Ng Report***

The [Ng Report](#), issued on December 13, 2022, was about the conduct of the Honourable Mary Ng, Minister of International Trade, Export Promotion, Small Business and Economic Development.

The examination focused on whether Minister Ng had contravened subsection 6(1), section 9 or section 21 of the Act by participating in the process that led to the awarding of two government contracts to a company owned by a friend. [Subsection 6\(1\)](#) prohibits public office holders from making a decision that would place them in a conflict of interest. As described in [section 4](#), they are in a conflict of interest when they exercise an official power, duty or function that provides an opportunity to further their private interests or those of their relatives or friends or to improperly further another person’s private interests. [Section 9](#) prohibits public office holders from using their position as a public office holder to seek to influence a decision of another person so as to further the public office holder’s private interests or those of their relatives or friends or to improperly further another person’s private interests. [Section 21](#) requires public office holders to recuse themselves from any discussion, decision, debate or vote on any matter in respect of which they would be in a conflict of interest.

In March 2019 and April 2020, contracts for media training services were signed on behalf of the Minister with a company co-founded and run by Ms. Amanda Alvaro. Former Commissioner Dion determined that Ms. Ng and Ms. Alvaro were friends within the meaning of the Act and that Ms. Ng was exercising an official power, duty or function when she participated in the process that led to the awarding of the contracts to her friend’s company. Given their friendship, obtaining services from the company improperly furthered its interests and placed Ms. Ng in a conflict of interest as defined by the Act, in contravention of subsection 6(1).

The Commissioner found that Ms. Ng also contravened section 21 of the Act by failing to recuse herself from the contract decisions. She should have known to instead withdraw from the process that led to the awarding of the contracts and obtain similar services from another provider.

Having determined that Ms. Ng was involved in the process that led to the awarding of the contracts, there was no need to examine the issue of her influence over the decisions to award those contracts under section 9 of the Act.

## Referrals from the Public Sector Integrity Commissioner

Matters may be referred to the Commissioner by the Public Sector Integrity Commissioner under subsection 24(2.1) of the [Public Servants Disclosure Protection Act](#). This provision also gives Canadians another way to make the Commissioner aware of possible issues. The Commissioner is required, by section 68 of the *Conflict of Interest Act*, to issue a public report on each referral, whether or not an examination is launched.

In 2022-2023, the Office issued three reports on referrals from the Public Sector Integrity Commissioner. None resulted in an examination as former Commissioner Dion found no reason to believe in any of the cases that the *Conflict of Interest Act* may have been contravened.

### **Scott Report**

The [Scott Report](#), issued on August 24, 2022, concerned an allegation of conflict of interest against Mr. Ian Scott, then Chairperson and Chief Executive Officer of the Canadian Radio-television and Telecommunications Commission (CRTC). It dealt with apparent conflicts of interest and the definition of friendship within the meaning of the Act.

It was alleged that Mr. Scott had several meetings with large telecommunication providers while they had files before the CRTC, thereby failing to avoid apparent conflicts of interest. However, apparent conflicts of interest are not captured by the prohibitions in the Act.

One of the meetings was with a senior BCE Inc. and Bell Canada executive who was described, in a media article, as a friend of Mr. Scott's. The week before, Bell Canada had asked the CRTC to review and vary an August 2019 Telecom Order. Mr. Scott was on the CRTC panel that issued a May 2021 Telecom Decision varying the order. Former Commissioner Dion was concerned that, by participating in that decision, Mr. Scott may have had an opportunity to further the private interests of a friend or to improperly further those of a corporation run by a friend. This would contravene subsection 6(1) of the Act, which prohibits a public office holder from making any decision or participating in the making of a decision that furthers their private interests or those of their relatives or friends, or that improperly furthers the private interests of another person.

After reviewing additional information, however, the Commissioner was satisfied that Mr. Scott and the executive's relationship could not be considered one of friendship within the meaning of the Act.

### **Report on alleged wrongdoing by the head of a federal organization**

The [Report on alleged wrongdoing by the head of a federal organization](#), issued on January 24, 2023, concerned an allegation against the head of a federal organization. The individual allegedly placed themselves in a conflict of interest by engaging in activities involving their previous employer in the context of their public duties, and appeared to give favourable treatment to a topic that is their field of expertise. As outlined in the report, the referral by the Public Sector Integrity Commissioner serves as a reminder to all public office holders to ensure they are familiar with the rules on outside activities in section 15 of the Act.

### **Report on alleged wrongdoing by a public office holder**

The [Report on alleged wrongdoing by a public office holder](#), issued on December 1, 2022, concerned allegations of conflict of interest against a public officer holder. When the allegations were made, the individual held an executive position with a federal agency and had previously held public office with a different federal agency. The individual allegedly used their public office to further their private interests or to improperly further the interests of a private company in which they had private interests. In fact, they had no private interests in the company and did not use their public office to improperly further its interests.

Barring exceptional circumstances, the Office's target is to conduct examinations within 12 months. In 2022-2023, the average time to complete an examination or review a referral from the Public Sector Integrity Commissioner was just over five months.

As of March 31, 2023, the Office was not working on any examinations under the Act.

## Case Files under the Act

When the Office receives information about a possible contravention of the Act, whether from a Senator or Member of the House of Commons, media reports, or complaints from members of the public, it may open a case file.

When a case file is opened, the Office conducts an initial review of the matter. Some of these reviews may lead to [examinations](#). When an examination is not found to be warranted, the case file is closed.

### *Case files under the Act in 2022-2023*

<b>How many case files were opened and closed?</b>	
<b>Total case files (a case file is a concern that is reviewed by the Office)</b>	<b>20</b>
Ongoing	1
Closed without an examination	14
Closed with publication of report	5
<b>Who was the subject of each case file?*</b>	
Current or former minister or parliamentary secretary	6
Current or former public office holder	14
Person not subject to the Act	0
<b>What was the source of these case files?</b>	
Member of the general public	8
Within the Office	1
Member of the House of Commons	2
Media	6
Office of the Public Sector Integrity Commissioner	3
<b>What was the nature of the concern?*</b>	
Furthering a private interest	10
Duty to recuse	3
Post-employment rules	1
Influence	7
Preferential treatment	2
Private air travel	0
Prohibited activities	2
Public declaration	1
Insider information	0
Gifts and other advantages	0
Material changes	0

\*Some case files deal with more than one concern

## Court Matters

Matters involving investigations are sometimes the object of applications for judicial review. While dealing with these can use a lot of resources, they can also help clarify the Commissioner's mandate and powers.

Democracy Watch filed an application for judicial review to the Federal Court of Appeal about former Commissioner Dion's findings in the 2021 [Trudeau III Report](#). In this report, the Commissioner had concluded that Prime Minister Justin Trudeau's involvement in awarding the administration of a COVID-19-related program to WE Charity did not contravene the Act, even though several members of Mr. Trudeau's family were closely involved in some of WE Charity's initiatives. The Commissioner determined that the scope of the Act was limited to real or potential conflicts of interest, and the mere existence of an apparent conflict was insufficient to result in a contravention of the Act.

In its Notice of Application, Democracy Watch raised alleged errors of law and of fact. It argued that the Commissioner was wrong to conclude that the Act's definition of conflict of interest excludes the appearance of conflict, and that the Commissioner's finding that Mr. Trudeau was not friends with WE Charity's co-founders was incorrect. As part of its Notice of Application, Democracy Watch also requested a certified copy of all the relevant materials the Commissioner looked at during the examination (called the "certified tribunal record").

The Commissioner objected to the request for the certified tribunal record on the basis that the Act's privative clause, [section 66](#), does not allow the types of grounds for review that Democracy Watch raised in its Notice of Application. In a motion to strike the Notice of Application, the Attorney General of Canada, who is the respondent in the case before the Federal Court of Appeal, also wrote that section 66 does not allow the Court to review the alleged errors of law and fact.

The judge who heard the Attorney General's motion to strike decided that the full panel hearing the merits of Democracy Watch's application should examine the question relating to section 66, because the full panel—not a single judge—needs to clarify the important issue of how privative clauses should be interpreted and applied (*Democracy Watch v. Canada [Attorney General]*, 2022 FCA 208).

Democracy Watch filed a specific motion to obtain the certified tribunal record. The Commissioner maintained the objection, noting that much of the material was confidential. In a second decision, the judge wrote that the Commissioner should not be required to disclose confidential documents in support of a ground that the Court might not be allowed to review because of section 66 (*Democracy Watch v. Canada [Attorney General]*, 2023 FCA 39).

The judge decided that the Court should therefore proceed in two stages. In stage 1, the full panel of the Court will determine how section 66 of the Act applies to the matter. If the Court determines that section 66 applies, it may dismiss Democracy Watch's application. Otherwise, if it determines that some or all of the grounds are allowed, it may move on to stage 2 and review the application on its merits.

As of March 31, 2023, a hearing date for stage 1 had not been set.

## PUBLIC COMMUNICATIONS

The Office shares information on its website, is active on social media, responds to inquiries from the media and members of the public, and delivers presentations to the interested public. The goal is to educate Canadians about the regimes it administers.

The Office monitors the volume of relevant Twitter, news, Question Period mentions, and website activity. Tracking these trends can help it prepare for an influx of public and media inquiries, for example, as high volumes tend to lead to workload increases for the Office. Tracking can also make it aware of issues that might relate to its work. The Office publishes this data in its [quarterly statistical reports](#) as context for the work done in any quarter.

## Website

The Office continued to maintain its website as an important source of information to help educate and inform regulatees, the media and the public. The number of website visitors remained steady with just a 2% increase, for a total of almost 54,000.

## Social Media

The Office's social media presence helps it stay aware of relevant discussions and participate in them as appropriate. It also uses social media to share information about the conflict of interest regimes it administers, its activities, and the public registry.

The Office stayed active on social media in 2022-2023. It maintained its Twitter presence and, in December 2022, created a LinkedIn account. This gives it another way to educate regulatees and the public and advertise job opportunities. Regulatees are always welcome to contact their advisors if they have any questions.

The January 2022 survey of public office holders revealed that only 30% rely on Twitter as a source of information about conflict of interest rules, so the Office shifted its Twitter strategy. It now focuses its tweets on educating its secondary audiences: the media, academics, international and domestic stakeholders, and members of the Canadian public who are interested in the Office's activities. It sends fewer tweets but aims to send more readers to information on its website. Twitter remains a preferred tool for the media, who are also key stakeholders of the Office. The Office's tweets can help them report accurately on the Office and its work.

The total number of Twitter followers for [@EthicsCanada](#) and [@EthiqueCanada](#) grew by 10% to 3,969, further increasing the Office's social media reach. It tweeted 7% less than in the previous year, sending one to two tweets a day. Nearly 5% of visits to the Office's website were from links on Twitter and the Office's own tweets drove nearly 2% of website traffic.

About 45% of the Office website's traffic resulted from Internet searches. Social media conversations about investigations and ethics matters lead to visits to the Office website to verify facts or get more information. For example, website activity spiked in the week after the Office released the *Ng Report*. This resulted from the Office's communications around the report, conversations on social media, and organic searches prompted by media articles.

## Media and Public Inquiries

The Office received nearly 1,800 information requests from the media and members of the public by phone, email, post, fax, and direct messages on Twitter.

At the end of May 2022, it received some emails calling on it to investigate parliamentarians' involvement in the World Economic Forum. Those emails spilled over from a coordinated email campaign that ran earlier in the year. They were prompted by media coverage of the campaign after it was mentioned in the 2021-2022 annual reports.

The Communications, Outreach and Planning division responds to media and public inquiries with accurate, timely and useful information. Although it cannot provide information about individual cases, the Office includes as much information as possible about the rules and their general application.

The Office responds only to emails that are directly addressed to it and not to ones it is simply copied on. Copies of emails that were not related to its mandate accounted for 80% of total correspondence received in 2022-2023.



The media can help give the public accurate information about the conflict of interest regimes. In 2022-2023, the Office received and responded to 113 media requests, including 9 interviews, up 20% from the year before. Inquiries about the status of a current case file or public office holder made up 60% of media requests. Only 25% were general inquiries about the role and mandate of the Office. The remaining 15% were related to investigation reports the Office published. Perhaps because of previous interactions with the Office, journalists appear to better understand the regimes, resulting in fewer requests for information about general topics and a more accurate explanation of the regimes administered by the Office.

## HOW THE OFFICE PERFORMED

The Office has a set of standards for service to regulatees and others. Its [quarterly statistical reports](#) track how it is meeting its service standards, whose achievement rate is set at 80%. In 2022-2023, the Office again surpassed that target.

### *Service standards*

	2022-2023
Contact all public office holders within three days of learning of their appointment or reappointment	96%
Respond to public office holders' requests for advice within three business days	92%
Respond to media inquiries within four hours	100%
Respond to public inquiries within 10 business days	92%

## COLLABORATION AND BEST PRACTICES

The Office maintained and strengthened connections with officials and organizations in Canada and other countries in 2022-2023.

### **Domestic Outreach**

#### ***CCOIN***

The Office continued to coordinate information sharing within the Canadian Conflict of Interest Network ([CCOIN](#)), made up of federal, provincial and territorial conflict of interest commissioners.

In 2022-2023, it added to its electronic library of information and materials from these jurisdictions. It shared summaries of reports on investigations done by CCOIN members. When asked, it also did research for them.

The Director of Communications, Outreach and Planning represented former Commissioner Dion at CCOIN's September 2022 annual meeting, hosted in Yellowknife by David Phillip Jones, K.C., Conflict of Interest Commissioner for the Northwest Territories. The Director also participated in its March 2023 semi-annual meeting, held virtually.

#### ***Collaboration***

Former Commissioner Dion met privately with other agents of Parliament to discuss common issues and concerns, and Office employees liaised with their counterparts in those agents' offices.

The Office was asked by the Treasury Board Secretariat to comment on a consultation paper on Public Safety Canada's Canadian Foreign Influence Transparency (CFIT) initiative.

## **International Outreach**

The Office is an active member of two international non-profit ethics organizations: the Réseau francophone d'éthique et de déontologie parlementaires ([RFEDP](#)) [link in French only] and the Council on Governmental Ethics Laws ([COGEL](#)).

### ***RFEDP***

Formed in 2018, the RFEDP is a group of public institutions in the [Organisation internationale de la Francophonie](#) that are involved in ethics and codes of conduct. It helps francophone parliamentarians stay connected, shares knowledge, encourages information-sharing, offers training, compares practices, and develops research.

In 2022-2023, the Director of Advisory and Compliance continued to serve on the RFEDP's Bureau.

The Office was part of two RFEDP working groups on training and best practices. The training working group finished its mandate in May 2022. It created a template for training that members can get from its website. The best practices working group was still active at the end of the year. The Office was also working with the RFEDP on a project to partner with universities on research about various topics. In November, former Commissioner Dion participated in the RFEDP's two-day annual general meeting. The Director of Communications, Outreach and Planning and the Acting Director of Advisory and Compliance also attended.

Through the RFEDP, the Office was consulted on several initiatives. In September 2022, it commented on the [Interparliamentary Union's](#) preliminary [indicators](#) aimed at helping parliaments measure their performance in overseeing parliamentary ethics and other areas. In October, it commented on the French version of the Cambodian Senate's ethics code.

### ***COGEL***

Formed in 1978, COGEL is a U.S.-based organization of government ethics practitioners.

The Office's Director of Communications, Outreach and Planning was a member of the program committee for [COGEL's 2022 conference](#), held in Montreal in December. Senior Office representatives gave two presentations at the event, which was also attended by several other Office employees. The Director of Communications, Outreach and Planning was on a panel about transparency and one of the Office's legal counsels was on a panel about blind trusts. The Director is also on the program committee for COGEL's 2023 conference, to be held in Kansas City, Missouri.

## ***Collaboration***

The Office is always pleased to meet with officials from other countries who wish to discuss Canada's ethics regimes and share best practices. In February 2023, it gave presentations to delegations from Ethiopia and South Africa.

The Office also responded to several information requests from or on behalf of international organizations.

In January 2023, it reviewed and commented on the G20 Anti-Corruption Working Group's *High-Level Principles on Promoting Integrity among Public Bodies and Authorities Involved in Preventing and Combating Corruption*. It also gave input for Canada's annual progress report on how it has implemented the [Inter-American Convention against Corruption and its Follow-Up Mechanism](#) (MESICIC).

In February, the Office commented on a review by South Africa and the United States of how Canada has implemented articles 5-14 and 51-59 of the [United Nations Convention against Corruption](#) (UNCAC).

# OUR TOOLS

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## OUR PEOPLE

The Office employs about 50 people. They have expertise in compliance, investigations, legal services, communications, parliamentary relations, and corporate management.

### Equity, Diversity and Inclusion

The Office recognizes the importance of fostering an engaged, qualified and productive workforce that embraces equity, diversity and inclusion, values differences, and supports the full participation of all employees.

The Office continued to work on complying with the [Employment Equity Act](#). The Act, in part, requires employers to take actions to ensure members of four designated groups are represented within their organizations: women, Indigenous people, persons with disabilities, and members of visible minorities.

The Office's Equity, Diversity and Inclusion Working Group is part of this effort. It includes employees from all divisions. The group led the development of a Policy on Equity, Diversity and Inclusion adopted in October 2022. Under it, a new Equity, Diversity and Inclusion Committee will tackle these objectives:

- Eliminate systemic barriers to employment and any other conditions that create disadvantages for both employees and prospective candidates.
- Foster inclusive discussions between employees and inclusive communications with external stakeholders.

The Committee made some recommendations that the Office implemented right away. For example, it now writes all job posters in plain language and posts them on boards that will be seen by diverse candidates. It also started working to put other recommendations into practice.

### Accessibility

The Office is committed to meeting all of its obligations under the [Accessible Canada Act](#). The Act aims to identify, remove, and prevent barriers to accessibility and to make Canada barrier-free by January 1, 2040.

In 2022-2023, the Office ran consultations on accessibility that included surveys. It reflected the feedback in its accessibility plan. That plan shows how the Office identifies and will remove and prevent barriers in its environment, policies, programs, practices, and services. The Office posted its [Accessibility Plan 2023-2025](#) on its website in December 2022.

As an example of how the Office is implementing the plan, it is using accessible formats for its digital communications. It has also started using plain language to help people access, understand, and use the information it shares. Some employees have joined the Government of Canada's Accessible Communications Community of Practice and its Plain Language Community of Practice. These networks of communications professionals offer excellent learning resources and activities.

The Office created a working group on accessibility. It will continue to consult persons with disabilities to identify, remove, and prevent barriers at the workplace and in all aspects of its communications and activities.

### Internal Communications

In 2022-2023, the Office finished implementing a wide-ranging plan to strengthen internal communications. These are especially important in a hybrid work environment. The strategy also responded to an area that a previous employee satisfaction survey had identified as needing improvement.

The Office's Internal Communications Working Group, with employees from all divisions, continued to further improve internal communications.

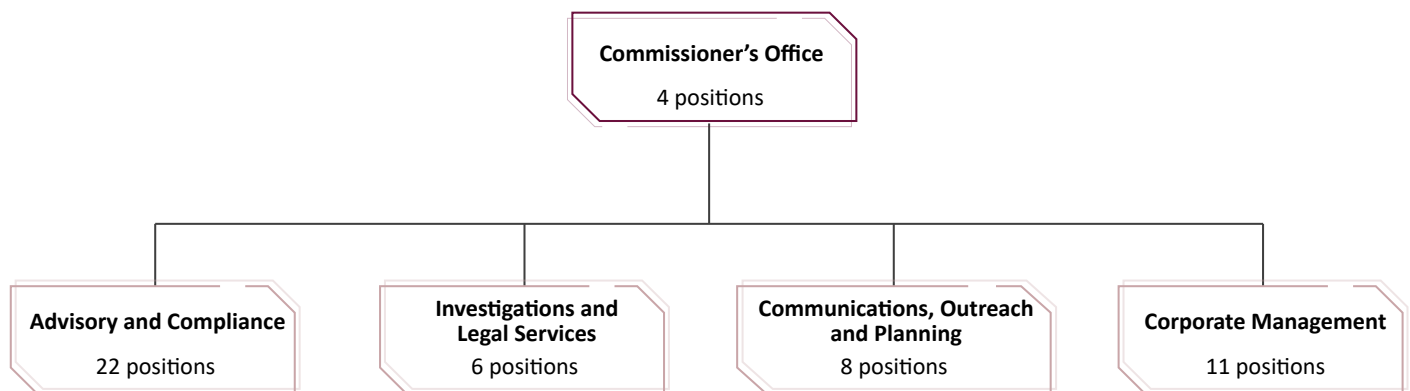
## Employee Satisfaction Survey

In June 2022, the Office conducted an employee satisfaction survey, something it does every three years. The results showed a high level of satisfaction in most areas. Most measures had improved or stayed at the same high level since the last survey in 2019. And almost all of those that had relatively low scores in 2019 went up in 2022. The survey did, however, highlight a few areas that could use some attention. The Office is taking action.

## Staffing

To make sure it has the right positions and the right people in them to carry out its mandate, the Office ran 14 staffing processes in 2022-2023.

Employee turnover rose in 2022-2023: four employees left.



## OUR INFRASTRUCTURE

The Office continued to update its internal policies and guidelines in line with those of other parliamentary entities and the wider public service. A suite of updated financial policies took effect in 2022-2023.

The Office's financial statements are audited each year by an independent external auditor. Its financial information for 2022-2023 is outlined in [Appendix A](#).

The Office continued to work with House of Commons IT services on a new, integrated system for compliance. The new system will replace the [declaration portal](#) that regulatees use to submit information, the [public registry](#) and the Office's internal case management system.

It will be a one-stop shop for regulatees, a single point where they can:

- submit information;
- keep their contact information up to date;
- communicate with their advisors;
- keep track of what they need to do;
- seek reimbursement of costs associated with blind trust fees and withdrawal from activities.

The public registry will be easier to use thanks to a new search interface. There will be no changes to the types of information it contains.

This project is complex and challenging. It has used a lot of time and resources and will launch later than originally planned. While delays are unfortunate, it is important to make sure the new system is built right.

Because many employees are working in a hybrid format, the Office started reducing its physical space requirements. As of September 2023, it will occupy just one floor instead of two at 66 Slater Street in Ottawa.

## **OUR PLAN**

The Office continued to implement a three-year strategic plan covering the 2021-2024 period.

The plan is an evergreen tool that helps the Office match its activities to strategic priorities. All projects listed in it are reviewed every quarter. Senior management may adjust some timelines to meet changing operational needs.

By March 31, 2023, the Office had completed over two thirds of the projects identified in the plan.

# APPENDIX A

## FINANCIAL RESOURCES SUMMARY

(thousands of dollars)					
Program Activities	2021-2022	2022-2023			Alignment to Government of Canada Outcomes
	Actual Spending	Main Estimates	Total Authorities	Actual Spending	
Administration of the <i>Conflict of Interest Act</i> and the <i>Conflict of Interest Code for Members of the House of Commons</i>	6,568	7,277	7,277	6,769	Government Affairs
Contributions to employee benefit plans	771	866	866	812	Government Affairs
<b>Total spending</b>	<b>7,339</b>	<b>8,143</b>	<b>8,143</b>	<b>7,581</b>	
Plus: cost of services received without charge	1,141	0	0	1,133	
<b>Net cost of department</b>	<b>8,480</b>	<b>8,143</b>	<b>8,143</b>	<b>8,714</b>	

The budget process for the Office of the Conflict of Interest and Ethics Commissioner is established in the *Parliament of Canada Act*. Before each fiscal year, the Commissioner has the Office prepare an estimate of its budgetary requirements. The estimate is considered by the Speaker of the House of Commons and then transmitted to the President of the Treasury Board, who lays it before the House with the estimates of the Government of Canada for the fiscal year. The mandate of the Standing Committee on Access to Information, Privacy and Ethics includes reviewing and reporting on the Office's effectiveness, management, and operations, together with its operational and expenditure plans.

Complete [audited financial statements](#) are available on the Office's website.

# APPENDIX B

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## PUBLIC OFFICE HOLDER SURVEY REPORT

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# Overview

## Background and purpose

The purpose of the 2022 Survey of Public Office Holders was to gather **baseline metrics** and **general insights** into how the Office of the Conflict of Interest and Ethics Commissioner (OCIEC) can improve how it communicates and engages with public office holders subject to the *Conflict of Interest Act*.

## Research objectives

To obtain baseline measures of:

- Knowledge of the OCIEC's mandate/purpose
- Interaction frequency with the OCIEC
- Perceived value of the OCIEC
- Perceived level of the OCIEC's trustworthiness
- Perceived level of the OCIEC's credibility
- Perceived level of the OCIEC's timeliness/proactivity
- Satisfaction with most recent OCIEC interaction

To obtain feedback regarding:

- Preferred OCIEC communication vehicles/channels
- General interest in receiving information from the OCIEC
- Preferred frequency of OCIEC communication
- Interest in OCIEC training opportunities
- Preferred OCIEC training format
- Preferred OCIEC training frequency
- Ways in which the OCIEC can improve to better serve its stakeholders

This survey research was designed to align with the OCIEC's 2021-2024 Strategic Plan, specifically, **Key Focus Area #1, Stakeholder Communications & Engagement**. The goal for this focus area is to "increase trust in, and credibility of the OCIEC with key stakeholders so that they become stronger allies in the delivery of the mandate of the OCIEC and can effectively manage conflict of interest issues."



## Methodology

- The survey was developed, tested, and deployed on the NOVI survey platform.
- A total of 1,500 public office holders subject to the Act were invited to take the survey via an email sent directly to them from the Communications, Outreach and Planning division.<sup>1</sup>
- A follow-up reminder email was sent out a few days before the survey was closed.
- The survey was officially open for 11 days, from January 17 to January 28, 2022.
- There were 455 survey respondents resulting in a 30% response rate.
- The average survey completion time was 14 minutes.
- Respondents were able to complete the survey in the official language of their choice (82% opted for English and 18% for French).

## Statistical significance

- For questions where everyone responded (n=455) it can be stated that the survey responses represent the views of all public office holders subject to the Act within  $\pm 3.8$  percentage points 9.5 times out of 10.
- Only a small fraction of respondents skipped entire questions, usually under 10% (less than 45 respondents). In such cases, the survey responses represent the views of all public office holders subject to the Act within  $\pm 4.1$  percentage points 9.5 times out of 10.
- The above does not apply to qualitative open-ended responses, follow-up questions to a specific sub-group, and any sections of this report that summarize findings based on a sub-group (e.g., by role). In such cases the sample size (n) and/or a revised margin of error has been provided for reference.

## Note to readers

Key findings are presented in the sections that follow. An exact copy of the survey questions and survey instrument used has been provided in Appendix B.

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<sup>1</sup> Public office holders who are Members of the House of Commons and also subject to the *Conflict of Interest Code for Members of the House of Commons* were not included in the survey.

## Key overall takeaways

**Positive overall impression of the OCIEC:** Most respondents believe that the OCIEC is a credible (80%), impartial (76%), helpful (73%), and trustworthy (81%) organization.

**High familiarity with obligations under the Act:** The overwhelming majority of respondents (97%) stated they are familiar with their obligations under the Act.

**High satisfaction with one-on-one service delivery:** Most respondents (84%) that have recently interacted with an OCIEC employee (one-on-one) were satisfied with their experience and thought that the employee was courteous and helpful (91%), provided a timely and accurate response (89%), and provided them with the information they needed (86%).

**Strong appreciation of personalized service:** Most respondents stated that personal interactions are the top value-add of the OCIEC.

**Preference for online training:** When asked about preferred training methods, most respondents stated they prefer online training with a live presenter.

The top 3 preferred training topics are (in order):

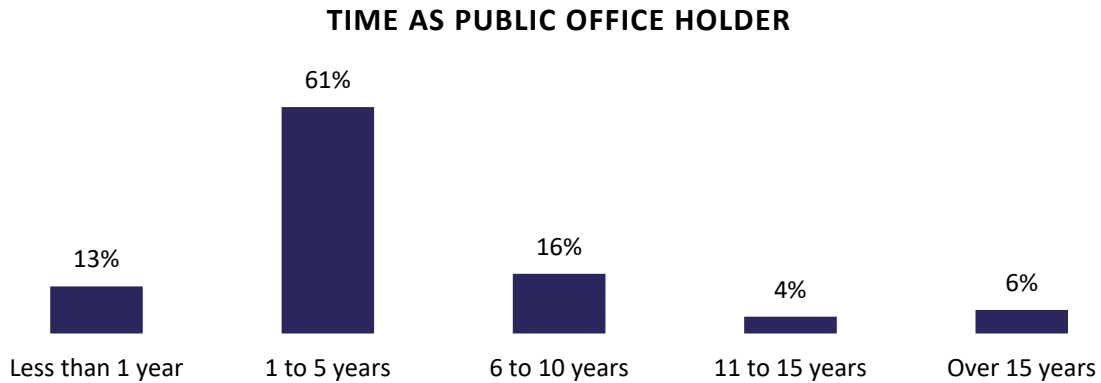
1. Material changes (assets, activities, etc.)
2. Recusals (private interests)
3. Post-employment

## Respondent breakdown

Respondents were asked to indicate attributes about their roles for the OCIEC to better understand and analyze the data.

### Time as public office holders

The majority of survey respondents (74%) indicated that they have been in their roles for less than five years.



*Figure 1 - Time as public office holder*

### Role as public office holders

The largest proportion of respondents (35%) were full-time tribunal/board/commission members. Approximately 6% of respondents did not place themselves in the role they belong to or did not feel they belong to any of the roles that were provided. Upon review of the comments, the OCIEC was able to categorize the “other” responses into their designated category and reflect them in the analysis.

## ROLE AS PUBLIC OFFICE HOLDER

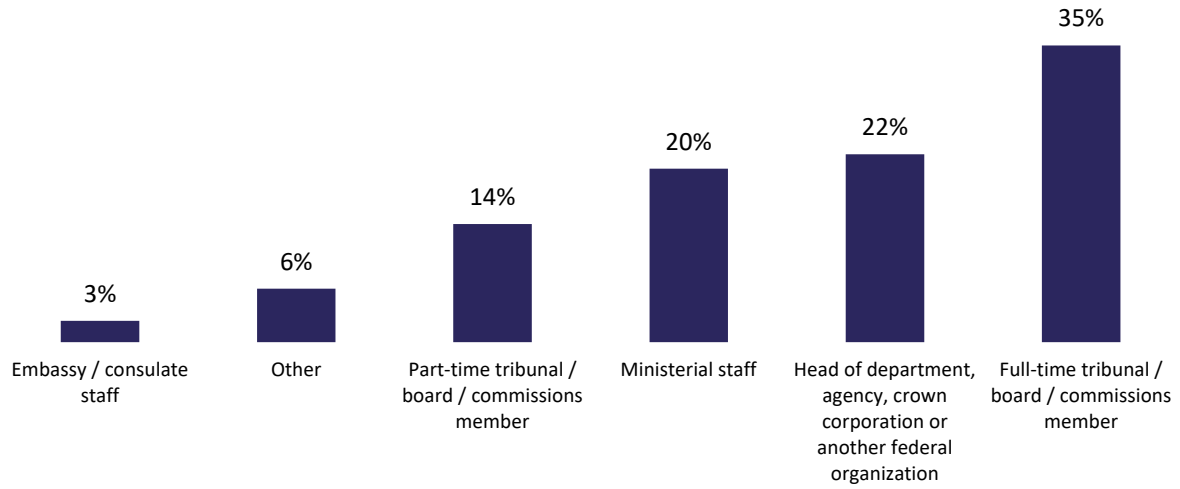


Figure 2 - Role as public office holder

### Familiarity with obligations under the Act

Most respondents (97%) were either somewhat familiar or very familiar with their obligations. Less than 1% stated that they were not at all familiar with their obligations.

## General findings

### Training

#### *Training topics*

Most respondents (60%) indicated they are interested in training opportunities from the OCIEC. The training topics of greatest interest are as follows (in order)<sup>2</sup>:

1. Material change (assets, activities, etc.)
2. Recusals (private interests)
3. Post-employment
4. Gifts
5. Penalties
6. Annual reports
7. Investigation reports
8. Quarterly reports

Respondents were also given an opportunity to state other training topics they would like to see that were not listed in the survey question. After categorizing these open-ended responses, it was determined that most of the specific topics mentioned could effectively be placed into one of the existing top three categories. The only new topics mentioned included cryptocurrency and advice for governor-in-council appointees (only a handful of individuals).

#### *Additional Context*

**Material Change** – The OCIEC website defines material change as “a change to any matter that you were required to include in your Confidential Report and that could affect your obligations under the Act and make it necessary to modify your compliance arrangements.” Examples of material change are acquiring assets valued at \$10,000 or more, becoming a trustee or a beneficiary of a trust, or opening any type of investment account, among others.

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<sup>2</sup> Survey respondents were given eight options of topics about which they might receive training. They were asked to rank these topics from 1 to 8, 1 being the topic most interesting to them, and 8 being the least. To make sense of these results, we gathered up all the responses and then generated averages for each item. Consistent with the ranking system, the averages closest to 1 were considered the most interesting topics to respondents, and the closest to 8 were the least interesting.

**Recusals** – The *Conflict of Interest Act* requires public office holders to recuse themselves from any discussion, decision, debate or vote on any matter in respect of which they would be in a conflict of interest. Respondents might want to know how to determine if a matter presents a conflict of interest, how to properly document recusals, and how to calculate the scope of discussions from which they must recuse themselves.

**Post-employment** – The *Conflict of Interest Act* has several provisions relating to post-employment, some limited and some unlimited. For instance, depending on public office holders' former positions, they must wait one or two years before working with a party with which they had "direct and significant dealings" during their time in office. This is commonly known as the "cooling-off" period. This would be a limited provision. However, there are also the following three rules, which apply for life to all former public office holders. They cannot:

- take improper advantage of their previous public office;
- switch sides, meaning act for or on behalf of any person or organization in relation to a specific proceeding, transaction, negotiation or case in which they previously acted for or provided advice to the government;
- provide advice to a client, business associate or employer using information they obtained while in office that is not available to the public.

**Gifts** – Relates to the following provision in the *Conflict of Interest Act*: "[Public office holders] must also disclose any gifts or other advantages from any one source, other than relatives and friends, that exceed \$200 in value in a 12-month period, within 30 days after acceptance or of the day on which their total value exceeds \$200." Gifts can take many forms, for instance meals, tickets to events, reduced rate or free membership to clubs or organizations, and money, among other things.

**Penalties** – Refers to the punishments that public office holders might receive for violating the rules set out in the *Conflict of Interest Act*. These penalties can go up to \$500 and are published both in the public registry on the OCIEC website and subsequently on Twitter.

**Annual reports, investigation reports, and quarterly reports** – All of these topics relate to the OCIEC's main communications products. Annual and quarterly reports are published periodically to update the public on the OCIEC's activities. Investigation reports are published after an investigation is completed.

### *Training methods*

Most respondents (61%) prefer to receive conflict-of-interest-related information proactively rather than searching for it on their own.

The preferred methods of training were stated to be as follows (in order)<sup>3</sup>:

1. Online educational sessions on a specific topic with live presenters
2. Customized educational group sessions for their organization
3. One-on-one personalized training
4. Self-study with OCIEC-provided materials
5. Online Q&A

### *Training frequency*

Respondents were almost equally divided between preferring to receive training quarterly (31%), annually (32%), or when topical (32%). Very few said monthly (3%) or never (2%).

## **Communications**

### *Perceived tone of OCIEC mass communication methods*

When asked about the tone of OCIEC mass communications, 82% of respondents agreed that the tone was clear, 89% agreed that it was professional and 88% agreed that it was respectful.

### *Preferred method of OCIEC mass communication*

Respondents were asked to rate the existing methods of OCIEC mass communications based on their helpfulness. The percentage in the table below reflects the number of respondents who stated the method in question was either **somewhat, very, or extremely helpful**.

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<sup>3</sup> Survey respondents were given five options of topics about which they might receive training. They were asked to rank these methods from 1 to 5, 1 being the method most preferred, and 5 being the least. To make sense of these results, we gathered up all the responses and then generated averages for each item. Consistent with the ranking system, the averages closest to 1 were considered the most interesting topics to respondents, and the closest to 5 were the least interesting.

## PREFERRED MASS COMMUNICATION METHODS

(RANKED BY % WHO AGREE THEY ARE HELPFUL)

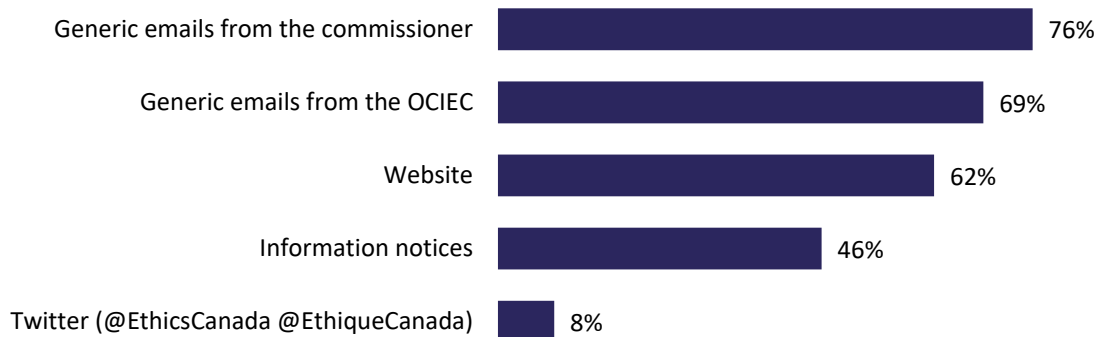


Figure 3 - Most helpful methods of mass communications

As can be seen, generic emails from the Commissioner came out on top (76%), whereas using Twitter as a method of OCIEC mass communications was only helpful to about 8% of respondents (21% stated it was not helpful). It should be noted that 71% stated it does not apply to them as they do not use Twitter.<sup>4</sup>

### *Preferred method of OCIEC private (one-on-one communications methods)*

Respondents were asked how helpful they found the OCIEC's one-on-one methods of communications. Currently, the OCIEC interacts with public office holders via email or by phone. In-person meetings are infrequent, even during pre-pandemic times. Emails and phone calls are the preferred methods of communications. Over 80% of respondents ranked video conferences and in-person meetings as not applicable.

## PREFERRED PRIVATE COMMUNICATION METHODS

(RANKED BY % WHO AGREE THEY ARE HELPFUL)

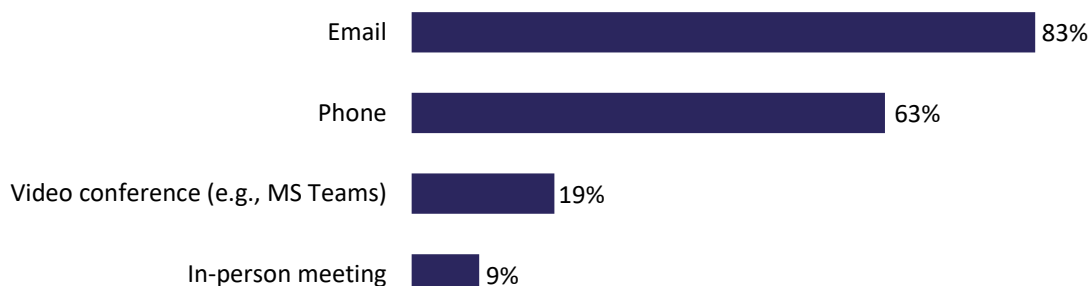


Figure 4 - Preferred private (one-on-one) communications methods

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<sup>4</sup> Roughly 30% of the respondents indicated that they rely on Twitter as a source of information about the conflict-of-interest regimes administered by the OCIEC. This is in line with statistics on Canadians' reliance on Twitter as a news source.



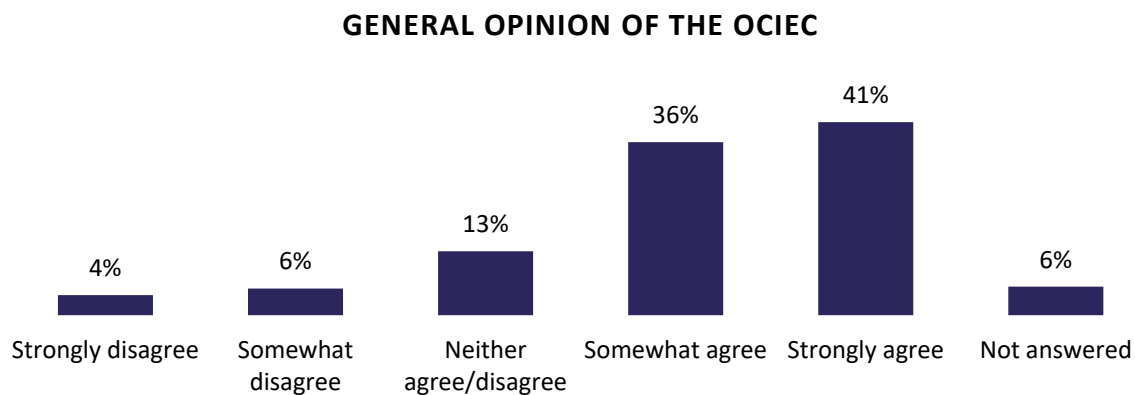
### *Additional suggested communications methods*

Respondents were also asked to comment on other forms of mass and private communication that they would like to see adopted. Only about 5% responded (n=22). The suggested additional methods included text messaging (for its speed and brevity) and LinkedIn.

### **Perceptions of the OCIEC**

#### *General opinion of the OCIEC*

Respondents were asked whether they agree with the statement: “My general opinion of OCIEC is positive.” 77% of respondents strongly or somewhat agreed and 13% of respondents did not agree or disagree with that statement. The remaining 10% somewhat or strongly disagreed.



*Figure 5 - General opinion of the OCIEC*

#### *Perception differences (by role)*

In the table below, results have been reflected by role to better illustrate how the respondent’s role might affect their perception of the OCIEC. For example, part-time members do not have reporting obligations and therefore do not interact as frequently with the OCIEC, which may affect how they perceive it.

In this question, respondents were presented with several statements about the OCIEC and asked to indicate how strongly they agreed or disagreed. The percentages in the table below represent those who answered “strongly agree” or “somewhat agree.”<sup>5</sup>

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<sup>5</sup> Between 5% and 25% of the respondents answered “Neither agree nor disagree.”

	OCIEC is credible	OCIEC is trustworthy	OCIEC is proactive	OCIEC is impartial	OCIEC is helpful
All respondents	80%	71%	67%	76%	73%
Ministerial staff	76%	78%	68%	71%	74%
Heads of departments	85%	85%	70%	82%	72%
Full-time members	79%	80%	66%	75%	72%
Part-time members	84%	84%	68%	81%	76%
Embassy/consulate staff	55%	64%	36%	50%	55%

Table 6 - Perceptions of the OCIEC based on respondents' profiles

While the overall perception of the OCIEC is high, the heads of departments as well as part-time members had the highest agreement level with most attributes, specifically, credibility, trustworthiness, and impartiality. The lowest scores came from embassy/consulate staff; however, the sample size from this group was extremely small.

The overall agreement level with the OCIEC being a proactive organization came in at 67%. This was the lowest score out of the provided attributes.

#### *Satisfaction with one-on-one service*

Respondents were also asked to think back on their most recent one-on-one interaction with an employee of the OCIEC and indicate how strongly they agreed or disagreed with the provided statements.

Once again, the sentiment tended to be quite positive, with those that agree with each statement seldom falling under 85%. Positive responses tended to once again be weaker among embassy/consulate staff, very likely due to their relative underrepresentation in the survey. Only 3% of respondents were embassy/consulate staff (n=11).

	OCIEC employee was courteous and helpful	OCIEC employee provided me with accurate information	OCIEC employee provided me with a timely response	OCIEC employee gave me the information that I needed	Overall, I was satisfied with my experience
All respondents	91%	89%	89%	86%	84%
Ministerial staff	90%	88%	85%	83%	81%
Heads of departments	91%	92%	90%	90%	86%
Full-time members	92%	87%	91%	88%	86%
Part-time members	85%	85%	92%	77%	85%
Embassy/consulate staff	80%	80%	80%	60%	60%

Table 7 - Perception of most recent one-on-one interaction based on respondents' profiles

Out of the 10% of people that stated they were dissatisfied with their experience, the top complaint was with the service quality, with some respondents saying that emails or phone calls had gone unanswered and others mentioning insufficient or inconsistent advice. Others, still, had complaints about the rules the OCIEC enforces. As one commenter said: "I was satisfied in that the employee answered my question and was obviously doing her job. I wasn't satisfied with what the law apparently required her to tell me... to complete a 19-page form and provide information that I just confirmed three months ago, because of inflexibility in the legislation."

The OCIEC is looking into the concerns these comments reveal to try and address them as best we can.

### *Greatest value-add*

Respondents were asked to answer an open-ended question as follows: “Which service or program offered by the OCIEC has the greatest value-add in terms of supporting you in meeting your compliance requirements?”

Upon categorizing the 173 responses received, personal interaction with an advisor came out as the greatest value-add of the OCIEC. Respondents appreciated the quick and clear advice they received that related specifically to their situations. The second most cited value-add was the training the OCIEC provides followed by the OCIEC’s annual update notices.

The results of this question allow us to understand what we are doing right and gives us ideas for how to adjust our strategy in areas with lower rates of satisfaction.

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# Appendix A – Survey results

1. How familiar are you with your obligations under the *Conflict of Interest Act*?

Question type: Multiple choice

Number of responses: 429

Number of respondents: 455

Answer	Count	Percent answer
Very familiar	214	47.0%
Somewhat familiar	202	44.4%
Not very familiar	11	2.4%
Not at all familiar	2	0.4%
The <i>Conflict of Interest Act</i> does not apply to me	0	0%
Not answered	26	5.7%

2. Please indicate the extent to which you agree or disagree with each of the following statements about the Office of the Conflict of Interest and Ethics Commissioner (OCIEC):

Question type: Matrix & Multimatrix

Number of responses: 450

Number of respondents: 455

Matrix row	Not answered	Strongly disagree	Somewhat disagree	Neither agree/disagree	Somewhat agree	Strongly agree
I am well aware of OCIEC's mandate	7 (1.5%)	13 (2.9%)	15 (3.3%)	23 (5.1%)	217 (47.7%)	180 (39.6%)
My general opinion of OCIEC is positive	6 (1.3%)	19 (4.2%)	25 (5.5%)	60 (13.2%)	163 (35.8%)	182 (40.0%)
The OCIEC is a credible organization	9 (2.0%)	15 (3.3%)	15 (3.3%)	61 (13.4%)	133 (29.2%)	222 (48.8%)
The OCIEC is a trustworthy organization	6 (1.3%)	16 (3.5%)	11 (2.4%)	59 (13.0%)	139 (30.5%)	224 (49.2%)
The OCIEC is a proactive organization	5 (1.1%)	14 (3.1%)	23 (5.1%)	112 (24.6%)	168 (36.9%)	133 (29.2%)
The OCIEC is an impartial organization	7 (1.5%)	16 (3.5%)	19 (4.2%)	71 (15.6%)	119 (26.2%)	223 (49.0%)
The OCIEC is a helpful organization	7 (1.5%)	22 (4.8%)	22 (4.8%)	78 (17.1%)	153 (33.6%)	173 (38.0%)
I feel comfortable approaching the OCIEC should the need arise	10 (2.2%)	17 (3.7%)	15 (3.3%)	47 (10.3%)	121 (26.6%)	245 (53.8%)

3. Thinking of the past 12 months, approximately how many times did you privately interact (one-on-one) with someone from the OCIEC?

Question type: Open-ended

Number of responses: 446

Number of respondents: 455

Answer	Not answered	Answered	Mean	Std dev	25% quartile	Median	75% quartile
	9 (2.0%)	446.0	2.5	3.4	0.0	2.0	3.0

4. Thinking of your most recent private interaction (one-on-one) with the OCIEC, indicate the extent to which you agree or disagree with each of the following statements.

Question type: Matrix & Multimatrix

Number of responses: 448

Number of “not applicable”: 114

Number of respondents: 455

<b>Matrix row</b>	<b>Not answered</b>	<b>Strongly disagree</b>	<b>Somewhat disagree</b>	<b>Neither agree/disagree</b>	<b>Somewhat agree</b>	<b>Strongly agree</b>
The OCIEC employee I interacted with was courteous and helpful	8 (2.3%)	13 (3.8%)	8 (2.3%)	9 (2.6%)	48 (14.1%)	255 (74.8%)
The OCIEC employee I interacted with provided me with accurate information	8 (2.3%)	13 (3.8%)	6 (1.8%)	19 (5.6%)	53 (15.5%)	242 (71.0%)
The OCIEC employee I interacted with provided me with a timely response	9 (2.6%)	14 (4.1%)	12 (3.5%)	12 (3.5%)	66 (19.4%)	228 (66.9%)
I was given the information I needed	9 (2.6%)	11 (3.2%)	17 (5.0%)	18 (5.3%)	49 (14.4%)	237 (69.5%)
Overall, I was satisfied with my experience	13 (3.8%)	18 (5.3%)	15 (4.4%)	19 (5.6%)	54 (15.8%)	222 (65.1%)



5. How helpful or unhelpful do you find the following OCIEC mass communication methods?

Question type: Matrix & Multimatrix

Number of responses: 435

Number of respondents: 455

Scale: 1 (Not at all helpful) – 5 (Extremely helpful); 0: NA

Matrix row	Not answered	Mean	Std dev	Count and % Rating 1	Count and % Rating 2	Count and % Rating 3	Count and % Rating 4	Count and % Rating 5	NA option
Website (ciec-ccie.parl.gc.ca)	158 (34.7%)	3.6	0.9	11 (2.5%)	20 (4.6%)	94 (21.8%)	128 (29.6%)	44 (10.2%)	135 (31.3%)
Generic emails from Commissioner Dion	83 (18.2%)	3.6	1.0	10 (2.3%)	32 (7.4%)	122 (28.2%)	143 (33.1%)	65 (15.0%)	60 (13.9%)
Generic emails from OCIEC (not specifically from the Commissioner)	108 (23.7%)	3.5	1.0	11 (2.5%)	37 (8.6%)	118 (27.3%)	128 (29.6%)	53 (12.3%)	85 (19.7%)
Twitter (@EthicsCanada   @EthiqueCanada)	332 (73.0%)	1.9	1.2	63 (14.8%)	26 (6.1%)	18 (4.2%)	10 (2.3%)	6 (1.4%)	304 (71.2%)
Information notices (often in PDF or HTML format)	217 (47.7%)	3.4	1.1	15 (3.5%)	24 (5.5%)	76 (17.6%)	89 (20.6%)	34 (7.9%)	195 (45.0%)

6. Are there any mass communication methods currently not being used that you would like OCIEC to adopt going forward?

Question type: Multiple choice

Number of responses: 441

Number of respondents: 455

Answer	Count	Percentage of answers
Yes	24	5.3%
No	416	91.4%
Not answered	15	3.3%

7. Please indicate the extent to which you agree or disagree with each of the following statements about the overall tone of OCIEC mass communication:

Question type: Matrix & Multimatrix

Number of responses: 450

Number of “not applicable”: 45

Number of respondents: 455

Matrix row	Not answered	Strongly disagree	Somewhat disagree	Neither agree/disagree	Somewhat agree	Strongly agree
The overall tone used in OCIEC mass communication is clear	5 (1.2%)	4 (1.0%)	15 (3.7%)	55 (13.4%)	172 (42.0%)	159 (38.8%)
The overall tone used in OCIEC mass communication is professional	8 (2.0%)	6 (1.5%)	3 (0.7%)	36 (8.8%)	124 (30.2%)	233 (56.8%)
The overall tone used in OCIEC mass communication is respectful	15 (3.7%)	6 (1.5%)	9 (2.2%)	32 (7.8%)	123 (30.0%)	225 (54.9%)

8. How helpful or unhelpful do you find the following official OCIEC private (one-on-one) communication methods?

Question type: Matrix & Multimatrix

Number of responses: 445

Number of respondents: 455

Scale: 1 (Not at all helpful) – 5 (Extremely helpful); 0: NA

Matrix row	Not answered	Mean	Std dev	Count and % Rating 1	Count and % Rating 2	Count and % Rating 3	Count and % Rating 4	Count and % Rating 5	NA option
Email	74 (16.3%)	4.4	0.8	3 (0.7%)	8 (1.8%)	31 (7.0%)	117 (26.4%)	222 (50.0%)	63 (14.2%)
Phone	167 (36.7%)	4.4	0.8	4 (0.9%)	4 (0.9%)	25 (5.7%)	81 (18.4%)	174 (39.5%)	153 (34.7%)
Videoconference (e.g. MS Teams)	366 (80.4%)	4.0	1.0	3 (0.7%)	3 (0.7%)	20 (4.5%)	30 (6.8%)	33 (7.5%)	351 (79.8%)
In-person meeting	401 (88.1%)	3.5	1.3	3 (0.7%)	11 (2.5%)	11 (2.5%)	13 (3.0%)	16 (3.7%)	384 (87.7%)

9. Please indicate the extent to which you agree or disagree with each of the following statements:

Question type: Matrix & Multimatrix

Number of responses: 448

Number of respondents: 455

<b>Matrix row</b>	<b>Not answered</b>	<b>Strongly disagree</b>	<b>Somewhat disagree</b>	<b>Neither agree/disagree</b>	<b>Somewhat agree</b>	<b>Strongly agree</b>
I prefer to find conflict of interest-related information on my own, when I need it, rather than having it sent to me proactively	8 (1.8%)	118 (25.9%)	153 (33.6%)	103 (22.6%)	55 (12.1%)	18 (4.0%)
I am interested in educational opportunities offered by the OCIEC	13 (2.9%)	16 (3.5%)	35 (7.7%)	126 (27.7%)	163 (35.8%)	102 (22.4%)

10. Please rank the following OCIEC-related topics in order of importance - 1 being the most important to you and 8 being the least important.

Question type: Rating & Ranking

Number of responses: 455

Number of “not applicable”: 44

Number of respondents: 455

Scale: 1 – 8; 0: NA

Answer	Mean	Std dev	Count and % Rating 0	Count and % Rating 1	Count and % Rating 2	Count and % Rating 3	Count and % Rating 4	Count and % Rating 5	Count and % Rating 6	Count and % Rating 7	Count and % Rating 8
Gifts	4.0	2.4	26 (6.3%)	35 (8.5%)	59 (14.4%)	70 (17.0%)	59 (14.4%)	52 (12.7%)	28 (6.8%)	20 (4.9%)	62 (15.1%)
Material change (assets, activities, ...)	2.4	1.8	18 (4.4%)	147 (35.8%)	99 (24.1%)	53 (12.9%)	38 (9.2%)	20 (4.9%)	19 (4.6%)	14 (3.4%)	3 (0.7%)
Recusals (private interests)	2.8	1.8	25 (6.1%)	77 (18.7%)	105 (25.5%)	72 (17.5%)	60 (14.6%)	31 (7.5%)	21 (5.1%)	15 (3.6%)	5 (1.2%)
Penalties	4.6	2.3	36 (8.8%)	9 (2.2%)	28 (6.8%)	36 (8.8%)	62 (15.1%)	96 (23.4%)	52 (12.7%)	44 (10.7%)	48 (11.7%)
Post-employment	3.3	2.0	18 (4.4%)	71 (17.3%)	59 (14.4%)	89 (21.7%)	73 (17.8%)	45 (10.9%)	22 (5.4%)	12 (2.9%)	22 (5.4%)
Investigation reports	4.8	2.2	35 (8.5%)	11 (2.7%)	14 (3.4%)	34 (8.3%)	47 (11.4%)	57 (13.9%)	138 (33.6%)	49 (11.9%)	26 (6.3%)
Annual reports	4.9	2.5	32 (7.8%)	43 (10.5%)	17 (4.1%)	28 (6.8%)	25 (6.1%)	48 (11.7%)	46 (11.2%)	145 (35.3%)	27 (6.6%)
Quarterly reports	6.1	2.5	37 (9.0%)	5 (1.2%)	13 (3.2%)	8 (1.9%)	19 (4.6%)	26 (6.3%)	48 (11.7%)	75 (18.2%)	180 (43.8%)

11. Are there any other topics that you would like the OCIEC to provide more information and/or training on?

Question type: Multiple choice

Number of responses: 441

Number of respondents: 455

Answer	Count	Percentage of answers
Yes	52	11.4%
No	387	85.1%
Not answered	16	3.5%

12. Please rank the following OCIEC training delivery formats in order of preference - 1 being the most preferred and 5 being the least preferred

Question type: Rating & Ranking

Number of responses: 455

Number of “not applicable”: 62

Number of respondents: 455

Scale: 1 – 5; 0: NA

Answer	Mean	Std dev	Count and % Rating 0	Count and % Rating 1	Count and % Rating 2	Count and % Rating 3	Count and % Rating 4	Count and % Rating 5
Online educational session on a specific topic with live presenters	2.0	1.4	30 (7.6%)	147 (37.4%)	86 (21.9%)	64 (16.3%)	40 (10.2%)	26 (6.6%)
Self-study with OCIEC-provided materials	2.9	1.6	29 (7.4%)	68 (17.3%)	71 (18.1%)	54 (13.7%)	82 (20.9%)	89 (22.6%)
One-on-one personalized training	3.2	1.7	33 (8.4%)	56 (14.2%)	44 (11.2%)	55 (14.0%)	83 (21.1%)	122 (31.0%)
Customized educational group session for your organization	2.6	1.5	32 (8.1%)	72 (18.3%)	92 (23.4%)	82 (20.9%)	57 (14.5%)	58 (14.8%)
Questions and answers online session	3.0	1.4	34 (8.7%)	29 (7.4%)	70 (17.8%)	106 (27.0%)	95 (24.2%)	59 (15.0%)

13. How often should the OCIEC be offering live educational opportunities?

Question type: Multiple choice

Number of responses: 440

Number of respondents: 455

Answer	Count	Percentage of answers
Never	7	1.5%
Annually	138	30.3%
Quarterly	135	29.7%
Monthly	14	3.1%
When topical	140	30.8%
Other	6	1.3%
Not answered	15	3.3%

14. Which service or program offered by the OCIEC has the greatest added value in terms of supporting you in meeting your compliance requirements?

Question type: Open-ended

Number of responses: 242

Number of respondents: 455

Not answered: 213

15. Which role best describes you as a public office holder?

Question type: Multiple choice

Number of responses: 447

Number of respondents: 455

<b>Answer</b>	<b>Count</b>	<b>Percentage of answers</b>
Head of Department, Agency, Crown Corporation or another federal organization	99	21.8%
Ministerial Staff	91	20.0%
Full-time Tribunal/Board/Commissions Member	156	34.3%
Part-time Tribunal/Board/Commissions Member	62	13.6%
Embassy/Consulate Staff	11	2.4%
Other	28	6.2%
Not answered	8	1.8%

16. Approximately how long have you been a public office holder?

Question type: Multiple choice

Number of responses: 446

Number of "not applicable": 2

Number of respondents: 455

<b>Answer</b>	<b>Count</b>	<b>Percentage of answers</b>
Less than 1 year	56	12.4%
1 to 5 years	269	59.4%
6 to 10 years	71	15.7%
11 to 15 years	20	4.4%
Over 15 years	28	6.2%
Not answered	9	2.0%

17. Do you have any additional suggestions or comments for the OCIEC that could help us better serve you?

Question type: Open-ended

Number of responses: 124

Number of respondents: 455

Not answered: 331



# Appendix B – Survey questions

## OCIEC Stakeholder Survey 2022

Thank you for taking the time to complete this survey from the Office of the Conflict of Interest and Ethics Commissioner (OCIEC). A part of the Office's wider external engagement plans, this survey will give us valuable insight into how to better communicate with and meet the needs of public office holders, like yourself, whom we oversee. It should take you about ten minutes to complete, and your answers will remain completely confidential. You can skip questions or end the survey at any point.

## OCIEC Stakeholder Survey 2022

1. How familiar are you with your obligations under the Conflict of Interest Act?

- Very familiar
- Somewhat familiar
- Not very familiar
- Not at all familiar
- The Conflict of Interest Act does not apply to me

2. Please indicate the extent to which you agree or disagree with each of the following statements about the Office of the Conflict of Interest and Ethics Commissioner (OCIEC):

	Strongly disagree	Somewhat disagree	Neither agree/disagree	Somewhat agree	Strongly agree
I am well aware of OCIEC's mandate	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
My general opinion of OCIEC is positive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The OCIEC is a credible organization	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The OCIEC is a trustworthy organization	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The OCIEC is a proactive organization	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The OCIEC is an impartial organization	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The OCIEC is a helpful organization	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I feel comfortable approaching the OCIEC should the need arise	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. Thinking of the past 12 months, approximately how many times did you privately interact (one-on-one) with someone from the OCIEC?

*Responses must be between 0 and 100, inclusive*

4. Thinking of your most recent private interaction (one-on-one) with the OCIEC, indicate the extent to which you agree or disagree with each of the following statements.

Not applicable

	Strongly disagree	Somewhat disagree	Neither agree/disagree	Somewhat agree	Strongly agree
The OCIEC employee I interacted with was courteous and helpful	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The OCIEC employee I interacted with provided me with accurate information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The OCIEC employee I interacted with provided me with a timely response	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I was given the information I needed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Overall, I was satisfied with my experience	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have any other comments about your most recent private interaction (one-on-one) with the OCIEC?

0 / 4000

5. How helpful or unhelpful do you find the following OCIEC mass communication methods?

	Not at all helpful		Somewhat helpful		Extremely helpful		I do not recall coming across this content
	1	2	3	4	5		
Website (ciec-ccie.parl.gc.ca)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Generic emails from Commissioner Dion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Generic emails from OCIEC (not specifically from the Commissioner)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Twitter (@EthicsCanada   @EthiqueCanada)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information notices (often in PDF or HTML format)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

6. Are there any mass communication methods currently not being used that you would like OCIEC to adopt going forward?

E.g. Other social media platforms, text messages, instant messengers, etc.

- Yes  
 No

If you replied "yes", please specify your preferred method(s)

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7. Please indicate the extent to which you agree or disagree with each of the following statements about the overall tone of OCIEC mass communication:

Not applicable

	Strongly disagree	Somewhat disagree	Neither agree/disagree	Somewhat agree	Strongly agree
The overall tone used in OCIEC mass communication is clear	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The overall tone used in OCIEC mass communication is professional	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The overall tone used in OCIEC mass communication is respectful	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8. How helpful or unhelpful do you find the following official OCIEC private (one-on-one) communication methods?

	Not at all helpful		Somewhat helpful		Extremely helpful		I have not yet interacted privately (one-on-one) with the OCIEC using this method
	1	2	3	4	5		
Email	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Phone	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Videoconference (e.g. MS Teams)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
In-person meeting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Do you have any other comments about these private (one-on-one) communication methods that you would like to share?

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9. Please indicate the extent to which you agree or disagree with each of the following statements:

	Strongly disagree	Somewhat disagree	Neither agree/disagree	Somewhat agree	Strongly agree
I prefer to find conflict of interest related information on my own, when I need it, rather than having it sent to me proactively	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I am interested in educational opportunities offered by the OCIEC	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. Please rank the following OCIEC related topics in order of importance -- 1 being the most important to you and 8 being the least important.

Not applicable

Responses must be between 1 and 8, inclusive

Gifts

Material change (assets, activities, ...)

Recusals (private interests)

Penalties

Post-employment

Investigation reports

Annual reports

Quarterly reports

11. Are there any other topics that you would like the OCIEC to provide more information and/or training on?

Yes

No

If you replied "yes," please specify the topic(s).

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12. Please rank the following OCIEC training delivery formats in order of preference - 1 being the most preferred and 5 being the least preferred

Not applicable

Responses must be between 1 and 5, inclusive

Online educational session on a specific topic with live presenters

Self-study with OCIEC-provided materials

One-on-one personalized training

Customized educational group session for your organization

Questions and answers online session

Are there other training delivery formats that you would like us to use?

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13. How often should the OCIEC be offering live educational opportunities?

Never

Annually

Quarterly

Monthly

When topical

Other

14. Which service or program offered by the OCIEC has the greatest added value in terms of supporting you in meeting your compliance requirements?

Please only state the top item that comes to mind

15. Which role best describes you as a public office holder?

Head of Department, Agency, Crown Corporation or another federal organization

Ministerial Staff

Full-time Tribunal/Board/Commissions Member

Part-time Tribunal/Board/Commissions Member

Embassy/Consulate Staff

Other

16. Approximately how long have you been a public office holder?

Not applicable

17. Do you have any additional suggestions or comments for the OCIEC that could help us better serve you?